



FALL CREEK ENGINEERING, INC.

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December 20, 2009

Charles Reed, P.E.
Water Resource Control Board
North Coast Region
5550 Skylane Blvd., Suite A
Santa Rosa, CA 95403

Subject: **Comments on Tentative Wastewater Discharge Requirements
Sea Ranch Lodge, Sea Ranch, California, Order No. R1-2010-0002
ID No. 1B06006RSON**

Dear Mr. Reed:

On behalf of Sea Ranch Inn, LLC, Fall Creek Engineering, Inc, (FCE) has reviewed and prepared comments on the tentative Waste Discharge Requirements (WDRs) for the Sea Ranch Lodge. In general the WDRs are comprehensive and will be protective of water quality on the site.

Based on our review, FCE has prepared the following comments:

1. Groundwater Limitation 4, which limits the shallow groundwater to 1.1 MPN per 100 mls as measured in the onsite monitoring wells would place the SRL in violation of coliform bacteria in any monitoring well. Given that we are measuring very shallow groundwater that could easily contain total coliform bacteria that is unrelated to the wastewater system, FCE would recommend revising this limitation so that it is based on comparing the coliform bacteria in up- and down-gradient monitoring wells, so that the limit is based on a no net increase in coliform bacteria in the wells.
2. FCE would also recommend noting in the WDRs that no groundwater on the site or in close proximity to the lodge is used for domestic or municipal supply. Shallow groundwater expressed as seeps on the site replenish wetlands and seep over the coastal bluffs supporting coastal vegetation and wildlife. The wastewater system improvements will be set back from all of the seeps and wetland areas.

Thank you for the opportunity to review the tentative WDRs. If you have any questions or require additional information, please contact me at (831) 426-9054.

Sincerely,

PETER HAASE, P.E.

Principal Engineer

cc: Peter Heinemann, Sabastopol